

Attorneys for Defendant
JULIO NEVAREZ-ERUNEZ

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|---------------------------|---|--------------------------------------|
| UNITED STATES OF AMERICA, |) | Case No. 2:22-cr-210-DJC |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | STIPULATION AND ORDER TO |
| |) | MODIFY CONDITIONS OF PRETRIAL |
| JULIO NEVAREZ-ERUNEZ, |) | RELEASE |
| |) | |
| Defendant. |) | Judge: Hon. Kendall J. Newman |
| |) | |

Mr. Nevarez-Erunez was released from custody onto pretrial supervision on April 26, 2023. ECF No. 70. He is currently residing and working in Oregon. The conditions of his release require him to participate in location monitoring and abide by a daily curfew to his residence from 8:00 p.m. to 6:00 a.m. *See* ECF No 75 at ¶¶12, 13. Since his release, for over six months, Mr. Nevarez-Erunez has complied with all conditions, including his location monitoring and curfew, and is currently employed.

1 In addition, in late September, Mr. Nevarez-Erunez sought permission to temporarily
2 suspend Special Conditions 12 and 13, related to his location monitoring and curfew, in order to
3 travel out of district on a work project. *See* ECF No. 90. After completing the work project, he
4 reported back to pretrial services with no issues.
5

6 In light of this, the parties now request that Mr. Nevarez-Erunez's conditions of release
7 be modified, and specifically that Conditions 12 and 13 be removed entirely. Pretrial Services
8 has no objection to the modification. All other previously imposed terms and conditions will
9 remain in full force and effect.
10

11 Dated: November 1, 2023

Respectfully submitted,

13 HEATHER E. WILLIAMS
14 Federal Public Defender

15 /s/ Meghan D. McLoughlin
MEGHAN D. McLOUGHLIN
16 Assistant Federal Defender
Attorneys for Defendant
17 JULIO CESAR NEVAREZ-ERUNEZ

18 Dated: November 1, 2023

PHILLIP A. TALBERT
UNITED STATES ATTORNEY

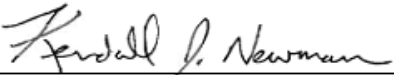
19 /s/ Emily G. Sauvageau
20 EMILY G. SAUVAGEAU
21 Assistant United States Attorney
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FINDINGS AND ORDER

Pursuant to the parties' stipulation, and good cause appearing, the Court hereby modifies the Order Setting Special Conditions of Release, ECF No. 75, to remove Special Conditions 12 and 13. All other previously imposed terms and conditions will remain in full force and effect.

IT IS SO FOUND AND ORDERED.

Dated: November 1, 2023


KENDALL J. NEWMAN
UNITED STATES MAGISTRATE JUDGE

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